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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARC DORN, individually and on behalf of
all other persons similarly situated,

Plaintiff,

vs.

EDDINGTON SECURITY, INC., BOVIS
LEND LEASE LMB, INC., and MARK
EDDINGTON,

Defendants.

Civil Action No. 08-10271(LTS)

DECLARATION OF COUNSEL

WILLIAM H. HEALEY, hereby declares as follows:

1. I am an attorney-at-law of the State of New York and am admitted to practice in the United States District Court for the Southern District of New York. I am also a member of the firm of Mandelbaum, Salsburg, Lazris & Discenza, P.C., attorneys for Defendants Eddington Security, Inc. and Mark Eddington (the “Eddington Defendants”). In this capacity, I have personal knowledge of the facts and documents identified herein. I submit this Declaration to demonstrate Eddington Defendants’ compliance with the notice requirement of the Class Action Fairness Act of 2005, 28 U.S.C. §1715 (“CAFA Notice”).

2. On June 17, 2011, this office served a CAFA Notice, via Priority Mail, upon the Attorney General of the United States. In addition, based on the representation of the Claims Administrator of where the class members currently reside, a CAFA Notice was served upon the Attorneys General of the following states: California, Florida, Georgia, Illinois, Maryland, Massachusetts, Missouri, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Texas, Virginia, and the Commonwealth of Puerto Rico.

3. The CAFA Notices consisted of a cover letter, a true and correct copy of the cover letters are annexed as ***Exhibit A***, and a copy of the following documents:

- a. Plaintiff's Class Action Complaint, *Dorn v. Eddington Security, Inc., et al.*, Case No. 08-CIV-10271 (LTS) (filed November 25, 2008), a true and correct copy of which is annexed hereto as ***Exhibit B***;
- b. Plaintiff's First Amended Class Action Complaint (filed January 26, 2009), a true and correct copy of which is annexed hereto as ***Exhibit C***;
- c. Order Granting Plaintiff's Provisional Certification of the Settlement Classes, Appointment of Plaintiff's Counsel as Class Counsel, and Approval of Plaintiff's Proposed Notice of Settlements (filed January 20, 2011), a true and correct copy of which is annexed hereto as ***Exhibit D***;
- d. Order adjourning fairness hearing (filed May 24, 2011), a true and correct copy of which is annexed hereto as ***Exhibit E***;
- e. Final version of notification to the class members, a true and correct copy of which is annexed hereto as ***Exhibit F***;
- f. Final settlement agreement between Plaintiff and Eddington Defendants, a true and correct copy of which is annexed hereto as ***Exhibit G***;

- g. Final settlement agreement between Plaintiff and Defendant Bovis Lend Lease LMB, Inc., a true and correct copy of which is annexed hereto as ***Exhibit H***;
- h. A spreadsheet of class member(s) that resided in the recipient's state (or, in the case of the Attorney General of the United States, all of the class members) and the estimated proportionate share of the award, a true and correct copy of spreadsheet provided to the Attorney General of the United States is annexed hereto as ***Exhibit I***; and
- i. [Proposed] Order Granting Plaintiff's Motions for Certification of Settlement Classes, Final Approval of Class Action Settlements, and Approval of FLSA Settlements, Approval of Attorneys' Fees and Reimbursement of Expenses, and Class Representative Service Award, a true and correct copy of which is annexed hereto as ***Exhibit J***.

4. As noted in Paragraph 3(h), except for the Attorney General of the United States, the Attorneys General only received a spreadsheet with information about class members from their respective states or commonwealth.

5. We have confirmation from USPS.com that the Attorneys General received the CAFA Notices on the following dates:

- a. **June 18, 2011** – New Jersey;
- b. **June 19, 2011** – Pennsylvania;
- c. **June 20, 2011** - California, Georgia, Illinois, Maryland, Massachusetts, Missouri, New York, North Carolina, Rhode Island, South Carolina, Texas, and Virginia;

d. **June 21, 2011** – Puerto Rico; and

e. **June 22, 2011** - Florida and the Attorney General of the United States.

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I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

By: /s/ William H. Healey
WILLIAM H. HEALEY

Dated: July 6, 2011